



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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2 TO: The Commission
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4 FROM: Kathleen Guith
5 Acting Associate General Counsel for Enforcement
6
7 Stephen Gura
8 Deputy Associate General Counsel for Enforcement
9
10 BY: Mark Shonkwiler *MS*
11 Assistant General Counsel
12
13 Saurav Ghosh *SG*
14 Attorney
15
16 SUBJECT: MUR 6761 (Teresa Wheatley, *et al.*)
17 Pre-Probable Cause Conciliation

18 On October 18, 2016, the Commission found reason to believe that Teresa Wheatley
19 violated 52 U.S.C. § 30122 by making \$5,000 in contributions to Dewhurst for Texas with funds
20 that she personally transferred to her bank account from the bank account of Alexander
21 Consulting Group, LLC, the consulting business of Kenneth A. "Buddy" Barfield. The
22 Commission authorized pre-probable cause conciliation with Wheatley, and approved a
23 conciliation agreement
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27 We believe that this agreement sufficiently vindicates the Commission's enforcement
28 interests under the circumstances presented. We therefore recommend that the Commission
29 accept the attached signed agreement and close the file in this matter.

30 **RECOMMENDATIONS**

- 31 1. Accept the attached signed conciliation agreement with Teresa Wheatley.
32 2. Approve the appropriate letter.
33 3. Close the file.
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